

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc. *et al.*¹

Debtors.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

Synacor, Inc.,

Plaintiff,

v.

IV Media, LLC; Innovation Ventures, LLC; Portal Acquisition Co.; iMedia Brands, Inc.; ValueVision Interactive, Inc.; VVI Fulfillment Center, Inc.; ValueVision Retail Inc.; JWH Acquisition Company; PW Acquisition Company, LLC; EP Properties, LLC; FL Acquisition Company; Norwell Television, LLC; 867 Grand Avenue, LLC; and Unidentified Parties, 1-25,

Defendants.

Adv. Proc. No. 23-50753 (KBO)

**STIPULATION BY AND BETWEEN PLAINTIFF AND
DEFENDANTS EXTENDING THE DEADLINE FOR THE
RULE 26(f) CONFERENCE AND PRE-TRIAL CONFERENCE**

Legacy IMBDS, Inc. (f/k/a iMedia Brands, Inc.), Portal Acquisition Company, ValueVision Interactive, Inc., VVI Fulfillment Center, Inc., ValueVision Retail, Inc., JWH Acquisition Company, PW Acquisition Company, LLC, EP Properties, LLC, FL Acquisition

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors' service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

Company, Norwell Television, LLC, and 867 Grand Avenue, LLC (collectively, the “Debtor Defendants”), IV Media, LLC and Innovation Ventures, LLC (collectively, the “Non-Debtor Defendants” and together with the Debtors Defendants, the “Defendants”) and the above-captioned plaintiff (the “Plaintiff”) have agreed, subject to approval of the Court, and given that the parties are in active settlement negotiations, to extend the Rule 26(f) conference and the pretrial conference originally scheduled for December 21, 2023 at 2:00 p.m. (EST) as set forth in the Summons and Notice of Pretrial Conference in the an Adversary Proceeding dated November 7, 2023 to January 23, 2024 at 9:30 a.m. (EST). All obligations attendant to the Rule 26(f) Conference pursuant to the Delaware Bankruptcy Court Local Rules, including Rules 7016-1 and 7026-3, are likewise extended.

Plaintiff, Non-Debtor Defendants, and Defendants likewise agree that the Pre-Trial Conference may be further extended upon written consent of the Stipulation Parties, which written consent may be provided by email from counsels to the parties, provided that the Plaintiff shall file a notice of any extension of the Pre-Trial Conference on the docket of this adversary proceeding.

[Remainder of Page Intentionally Left Blank]

Dated: December 15, 2023

**PACHULSKI STANG ZIEHL & JONES
LLP**

/s/ Timothy P. Cairns

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier
19801)
Telephone: 302-652-4100
Facsimile: 302-652-4400
E-mail: ljones@pszjlaw.com
tcairns@pszjlaw.com

-and-

ROPES & GRAY LLP

Ryan Preston Dahl (admitted *pro hac vice*)
Cristine Pirro Schwarzman (admitted *pro hac
vice*)
1211 Avenue of the Americas
New York, New York 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
E-mail: ryan.dahl@ropesgray.com
cristine.schwarzman@ropesgray.com

-and-

ROPES & GRAY LLP

Stephen L. Iacovo (admitted *pro hac vice*)
Jeramy D. Webb (admitted *pro hac vice*)
191 North Wacker Drive, 32nd Floor
Chicago, Illinois 60606
Telephone: (312) 845-1200
Facsimile: (312) 845-5500
E-mail: stephen.iacovo@ropesgray.com
jeramy.webb@ropesgray.com

Counsel for Debtor Defendants

GIBBONS P.C.

/s/ Christopher Viceconte

Christopher Viceconte (No. 5568)
Chantelle D. McClamb (No. 5978)
GIBBONS P.C.
300 Delaware Avenue, Suite 1015
Wilmington, Delaware 19801-1671
(302) 518-6300
cviceconte@gibbonslaw.com
cmcclamb@gibbonslaw.com

-and-

THOMPSON HINE LLP

Curtis L. Tuggle, Esq.
Jonathan S. Hawkins, Esq.
3900 Key Center
127 Public Square
Cleveland, Ohio 44144
(216) 566-5500
curtis.tuggle@thompsonhine.com
jonathan.hawkins@thompsonhine.com

-and-

Ryan Blackney, Esq.
20 N. Clark, Ste. 3200
Chicago, IL 60602
(312) 998-4283
rblackney@thompsonhine.com

Counsel for Plaintiff

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (No. 4435)
222 Delaware Avenue, Suite 1600
Wilmington, Delaware 19801
Telephone: (302) 661-7000
Email: dennis.meloro@gtlaw.com

Counsel for Non-Debtor Defendants

Dated December 15, 2023